REMARKS

This paper is in response to the Office Action mailed September 11, 2007 (hereinafter "Office Action") in connection with the above-referenced patent application. The Office Action rejected Claims 10 and 19 under 35 U.S.C. § 101 as directed to non-statutory subject matter. The Office Action rejected Claims 1-5, 7, 9-11, and 32-34 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,128,016, issued to Coelho et al. (hereinafter "Coelho"), U.S. Patent No. 5,896,491, issued to Englefield (hereinafter "Englefield"), and U.S. Patent Application Publication No. 2002/0080174 A1, by Kodosky et al. (hereinafter "Kodosky"). The Office Action rejected Claim 6 as unpatentable over Coelho, Englefield, Kodosky, and U.S. Patent No. 7,020,697, issued to Goodman et al. (hereinafter "Goodman"). The Office Action rejected Claims 8 and 12-19 under 35 U.S.C. § 103(a) as unpatentable over Coelho, Englefield, Kodosky, and U.S. Patent No. 5,815,152, issued to Collier et al. (hereinafter "Collier.").

Claims 1, 10, 12, 19, and 32 are amended. Claim 7 is canceled. Accordingly, Claims 1-6, 8-12, 14-19, and 32-34 are currently pending in the present application.

Pursuant to 37 C.F.R. § 1.111 and for the reasons set forth below, applicants respectfully traverse these rejections and request reconsideration and allowance of the pending claims. Prior to discussing the reasons why applicants believe that the pending claims are in condition for allowance, a brief description of the disclosed subject matter and the cited references are presented. It should be appreciated, however, that the following descriptions are provided to assist the Examiner in appreciating the differences between the claimed subject matter and cited references, and should not be construed as limitations on the disclosed subject matter.

Brief Descriptions

Claimed Subject Matter

The present application is generally related to a system and method for controlling a number of computing devices organized in an enterprise network, such as servers, from a central

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1420 Fifth Avenue, Suite 2800
Seattle, Washington 98101
206.682.8100

control computer by manipulating a common graphical user interface ("GUI"). More particularly, the GUI generates a set of graphical icons representative of a group of computing devices within a network that will be managed, and a set of graphical action icons representative of computing device actions captured by control parameters, that are to be executed by selected computing devices. A user of the GUI may select a computing device icon and/or an action icon and thereby implement the actions represented by the selected action icon on each of the computing devices represented by the selected computing device icon.

In one example of the present invention, a user may select several server icons (representing a group of servers) and an action icon that represents actions relating to the collection of performance monitoring data for the selected servers. Upon selection of the action icons for selected servers, those actions are automatically executed on each of the selected servers. In particular, the server control computer, upon receipt of a selection of servers and actions, generates and issues a template to each of the selected servers containing information to initiate the selected actions. Thus, the present invention provides the ability to control several networked computing devices, located at geographically distinct sites, by instructing to execute instructions from a common location on each server.

A user may also create an action icon by selecting one or more counters displayed by the GUI. The counters displayed are chosen by the GUI based on the designated roles of the servers in the enterprise network. Once the user makes a selection of a number of counters and a number of actions to perform on those counters, the GUI generates an action icon representing a control of the user-selected actions. Thus, the present invention provides the ability for a user to select a set of counters that are particularly relevant to a given server based on its assigned role in an enterprise network.

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CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue, Suite 2800
Seattle, Washington 98101
206.682.8100

Coelho (U.S. Patent No. 6,128,016)

Coelho is purportedly directed toward a graphical user interface ("GUI") for monitoring and displaying information pertaining to the components and subcomponents of a single server. (*See* Coelho, Col. 13, lines 11-17; Col. 16, lines 17-21; Figure 3.) The component categories and associated subcomponent categories are displayed as icons within a hierarchical navigation model. (Col. 8, lines 34-42; Figure 3, Levels 1 and 2.) A user may traverse through the component and subcomponent areas of a single server by selecting the displayed category icons. (Col. 8, lines 35-39; Figure 3.) Coelho teaches that selecting an icon triggers the navigation model to display either a next level of the selected component category or a dialog screen containing information. (Col. 8, lines 40-42; Figure 3.)

As presented in Coelho, the user may determine the status in addition to setting threshold values for items to be managed within the server. (Abstract.) The user monitors and updates the server with the latest values by clicking on a control button on a display screen. (Col. 10, lines 63-65; Col. 11, lines 19-21; Col. 11, lines 31-33.) Once an update value is added in, the workstation connects to a server system through a communications network. The workstation framework facility converts requests for reading and writing data from the application into the appropriate management application protocols within the TCP/IP protocol suite for communicating with the server. (Col. 3, lines 51-58. Figures 4b, 4c, and 4d.)

Coelho fails to teach or suggest displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, the choice based on a designated role of the networked computing devices in an enterprise network. Thus, Coelho further fails to teach or suggest obtaining a user selection of the number of actions, and generating an action icon representing a control of the user-selected number of actions. In addition, Coelho fails to teach or suggest displaying a set of graphical action icons for selection by a user, wherein each action icon

represents a control to the one or more actions to be executed on the one or more counters of the one or more computing devices. Moreover, Coelho fails to teach or suggest instructing the one or more actions controlled by the selected graphical action icon to execute on the one or more counters of each networked computing device controlled by the selected graphical computing device icon.

Englefield (U.S. Patent No. 5,896,491)

Englefield is purportedly directed toward a system and method for processing data represented on a display device. (Col. 1, lines 6-9.) Englefield teaches an icon display for representing each processing operation available to the user. (Col. 2, lines 25-27.) The processing operations are generally divided into two distinct types, i.e., interpretation operations and data generation operations. (Col. 1, line 26-Col. 2, line 5.) The user selects one of the processing operation icons. (Col. 5, line 67-Col. 6, line 2.) The user then moves a pointer to apply the processing operations to a list of data items on the graphical interface. (Col. 7, line 21-Col. 8, line 8.) These data items are illustrated in Figures 3A-5E as a list of numerical values in a file.

Nevertheless, Englefield fails to teach or suggest displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, the choice based on a designated role of the networked computing devices in an enterprise network. Thus, Englefield also fails to teach or suggest obtaining a user selection of the number of actions, and generating an action icon representing a control of the user-selected number of actions. Further, Englefield fails to teach or suggest graphical computing device icons which represent a control of one or more computing devices in a network. Accordingly, Englefield fails to teach or suggest obtaining a selection of the one or more computing devices controlled by a graphical computing device icon. In addition, Englefield fails to teach or suggest instructing the one or more actions controlled by

the selected graphical action icon to execute on the one or more counters of each networked computing device controlled by the selected graphical computing device icon.

Kodosky (U.S. Publication No. 2002/0080174 A1)

Kodosky is purportedly directed toward a system and method for generating a hardware implementation of graphical code. (Abstract.) Kodosky is primarily directed toward purportedly providing a user the ability to use graphical programming techniques to automatically control programmable hardware elements, or instruments. (Col. 4, line 58—Col. 5, line 2.) The instruments are coupled to a computer system. (Figure 6, item 264.) Using a graphical programming system such as LabVIEW (Col. 16, lines 9-11), a user creates a graphical program on the computer system, which is then converted into a version that the instrument can execute. (Figure 6A, item 266A.)

Kodosky fails to teach or suggest displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, the choice based on a designated role of the networked computing devices in an enterprise network. Accordingly, Kodosky also fails to teach or suggest obtaining a user selection of the number of actions, and generating an action icon representing a control of the user-selected number of actions.

Goodman (U.S. Patent No. 7,020,697)

Goodman is purportedly directed toward a so-called "netcentric" computing system. (Abstract.) This netcentric computing system centers around the use of a browser as a client. (Col. 2, lines 45-55.) Purportedly, application logic can be packaged into components and distributed from a server to a client over a network connection. (Col. 3, lines 29-37.) The layered architecture described in Goodman includes a development architecture to enable netcentric application development. (Col. 4, lines 34-44.)

Goodman similarly fails to teach or suggest displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, the choice based on a designated role of the networked computing devices in an enterprise network. Accordingly, Goodman also fails to teach or suggest obtaining a user selection of the number of actions, and generating an action icon representing a control of the user-selected number of actions.

Collier (U.S. Patent No. 5,815,152)

Collier, according to its abstract, purportedly describes a method and apparatus for graphically defining a rule to be evaluated by a computer system for determining actions to be taken during processing of an instance of a system entity. (Abstract.) Rules may contain conditions, which may be subprocesses, manual tasks, automated tasks, manual decision points, or parallel objects. (Col. 8, lines 6-8.) Parallel objects are tasks that can be performed concurrently and must all complete before processing will continue to the next task, although Collier does not disclose that the tasks are guaranteed to start or execute at the same time. (Col. 8, lines 22-25.)

Collier fails to teach or suggest displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, the choice based on a designated role of the networked computing devices in an enterprise network. Accordingly, Collier also fails to teach or suggest obtaining a user selection of the number of actions, and generating an action icon representing a control of the user-selected number of actions.

Rejection of Claims 10 and 19 Under U.S.C. § 101

As indicated above, the Office Action rejected Claims 10 and 19 under 35 U.S.C. § 101 as directed to non-statutory subject matter. In response, applicants have amended Claims 10 and

19 to recite "a tangible computer-readable storage medium." Applicants therefore respectfully submit that withdrawal of the 35 U.S.C. § 101 rejection of Claims 10 and 19 is merited.

The Claims Distinguished

Independent Claims 1, 12, and 32

As indicated above, the Office Action rejected Claims 1 and 32 under 35 U.S.C. § 103(a) as unpatentable over Coelho, Englefield, and Kodosky. The Office Action further rejected Claim 12 under 35 U.S.C. § 103(a) as unpatentable over Coelho, Englefield, Kodosky, and Collier. Applicants respectfully traverse these rejections. Claim 1, as amended, reads as follows:

> 1. A method of providing a computing device control interface for centrally controlling a plurality of networked computing devices, the method comprising:
>
> displaying a number of actions to be executed on one or more counters related to specific functions of a number of networked computing devices, the counters chosen from a set of counters, *the choice based on a designated role of the networked computing devices in an enterprise network*;
>
> obtaining a user selection of the number of actions;
>
> generating an action icon representing a control of the user-selected number of actions;
>
> displaying a set of graphical action icons for selection by a user, wherein each action icon represents a control to one or more actions to be executed on one or more counters of one or more computing devices;
>
> displaying a set of graphical computing device icons wherein each graphical computing device icon represents a control to one or more networked computing devices;
>
> obtaining a selection of initializing the one or more actions controlled by a graphical action icon;
>
> obtaining a selection of initializing the one or more networked computing devices controlled by a graphical computing device icon; and
>
> instructing the one or more actions controlled by the selected graphical action icon to execute on the one or more counters of each networked computing device controlled by the selected graphical computing device icon. (emphasis added.)

Similarly, Claim 12 reads as follows:

12. In a computer system having a display and at least one graphical user interface selection device, a method of providing a centralized server control interface for executing a group of actions concurrently on a group of networked computing devices, the method comprising:

displaying a number of actions to be executed on counters related to specific functions of a group of networked computing devices, the counters chosen from a set of counters, *the choice based on a designated role of the networked computing devices in an enterprise network*;

obtaining a user selection of the number of actions;

displaying the group of actions as an action icon on the display;

obtaining an identification of a group of networked computing devices on which to execute the group of actions;

displaying the group of networked computing devices as a computing device icon on the display;

obtaining a selection of the action icon by the graphical user interface selection device; and

instructing the group of actions displayed as the selected action icon to execute on the group of networked computing devices displayed as the computing device icon upon manipulating the selected action icon to overlap on the computing device icon. (emphasis added.)

Claim 32 reads as follows:

32. A method of providing a server control interface for centrally controlling a plurality of networked servers, the method comprising:

displaying a number of actions to be executed on one or more counters, the counters chosen from a set of counters, the choice *based on a designated role of the networked servers in an enterprise network*;

obtaining a user selection of the number of actions;

generating an action icon representing a control of the user-selected number of actions;

displaying a set of graphical action icons for selection by a user, wherein each action icon representing a control to one or more actions to be executed by one or more networked servers, and wherein at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning;

displaying a set of graphical server icons wherein each graphical server icon represents a control to one or more networked servers;

obtaining a selection of initializing the one or more actions controlled by a graphical action icon;

obtaining a selection of initializing the one or more networked servers controlled by a graphical server icon; and

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1420 Fifth Avenue, Suite 2800
Seattle, Washington 98101
206.682.8100

> instructing the one or more actions controlled by the selected graphical action icon to execute on the one or more counters of each networked server controlled by the selected graphical server icon. (emphasis added.)

The Office Action asserts that Coelho in combination with Englefield and Kodosky teaches each of the elements of Claims 1 and 12, and that Coelho in combination with Englefield, Kodosky, and Collier teaches each of the elements of Claim 32. Applicants respectfully disagree. Neither Coelho, Englefield, Kodosky, nor Collier teaches, describes, or suggests an arrangement of servers in an enterprise network, nor do they teach, describe, or suggest servers that have been given a designated role in an enterprise network.

Coelho primarily relates to monitoring a single server, and Englefield primarily relates to a system for manipulating a GUI to process data contained on the system. Neither of these references contemplate a network, let alone an enterprise network or choosing counters based on a given server's designated role in that enterprise network. Kodosky primarily relates to a system where a computer controls a number of instruments. While the instruments of Kodosky may be connected to a computer via a network, Kodosky does not teach, describe, or suggest an enterprise network where servers have been given designated roles, or choosing counters based on a given server's designated role. Similarly, Collier primarily relates to a method and apparatus for creating graphical workflow rules that may execute on a network. However, Collier fails to teach, describe, or suggest servers in an enterprise network with designated roles, or choosing counters based on a given server's designated role.

None of these references contemplate that servers in a network would be assigned different roles and perform different tasks, and that, while all servers may make all counters available, different subsets of counters would be relevant on different servers based on a given server's particular role. Therefore, applicants respectfully submit that Coelho, Englefield, Kodosky, and Collier, alone or in combination, do not teach, describe or suggest counters that

are chosen *based on a designated role of the networked computing devices in an enterprise network* as recited in amended Claims 1, 12, and 32.

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993). For the above reasons, applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of Claims 1, 12, and 32 and assert that Claims 1, 12, and 32 are patentable under 35 U.S.C. § 103(a) over Coelho, Englefield, Kodosky, and Collier.

Dependent Claims 2-6 and 8-11

Claims 2-6 and 8-11 depend from Claim 1. As discussed above, Coelho, Englefield, and Kodosky fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-6 and 8-11 are likewise allowable over the cited art. In addition, Claims 2-6 and 8-11 further add to the patentability and nonobviousness of the claims. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections of Claims 2-6 and 8-11, and respectfully request allowance of the claims.

Dependent Claims 14-19

Claims 14-19 depend from Claim 12. As discussed above, Coelho, Englefield, Kodosky, and Collier fail to teach or suggest each of the limitations recited in Claim 12. Accordingly, for the above-mentioned reasons, Claims 14-19 are likewise allowable over the cited art. In addition, Claims 14-19 further add to the nonboviousness of the claims. For these reasons, applicants respectfully request withdrawal of the Section 103(a) rejections of Claims 14-19 and allowance of the claims.

Dependent Claims 33-34

Claims 33-34 are dependent on Claim 32. As discussed above, Coelho, Englefield, and Kodosky fail to teach or suggest each of the limitations recited in Claim 32. Accordingly, for the

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CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue, Suite 2800
Seattle, Washington 98101
206.682.8100

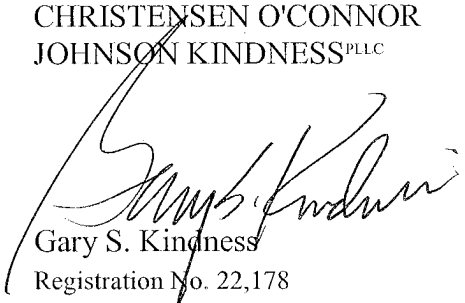
above-mentioned reasons, Claims 33-34 are likewise allowable over the cited art. In addition, Claims 33-34 further add to the patentability of the claims. For these reasons, applicants respectfully request withdrawal of the Section 103(a) rejections of Claims 33-34 and allowance of the claims.

CONCLUSION

Based on the above-referenced arguments, applicants respectfully submit that all of the pending claims of the present application, Claims 1—6, 8-12, 14-19, and 32-34, are allowable over the cited and applied references. Accordingly, applicants respectfully request withdrawal of all the rejections of the claims of the present invention and allowance of the present application. If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS PLLC



Gary S. Kindness
Registration No. 22,178
Direct Dial No. 206.695.1702

GSK/DPS:lal

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue, Suite 2800
Seattle, Washington 98101
206.682.8100